

## EXHIBIT B



**Service of Process  
Transmittal**

07/01/2021

CT Log Number 539834127

**TO:** Sue Carlson  
Target Corporation  
1000 NICOLLET MALL  
MINNEAPOLIS, MN 55403-2542

**RE: Process Served in New York**

**FOR:** Target Corporation (Domestic State: MN)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** CECELIA LOPEZ, Pltf. vs. TARGET CORPORATION, Dft.  
**DOCUMENT(S) SERVED:** --  
**COURT/AGENCY:** None Specified  
Case # E2021005514  
**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition  
**ON WHOM PROCESS WAS SERVED:** C T Corporation System, New York, NY  
**DATE AND HOUR OF SERVICE:** By Process Server on 07/01/2021 at 14:48  
**JURISDICTION SERVED :** New York  
**APPEARANCE OR ANSWER DUE:** None Specified  
**ATTORNEY(S) / SENDER(S):** None Specified  
**ACTION ITEMS:** CT has retained the current log, Retain Date: 07/01/2021, Expected Purge Date: 07/06/2021  
Image SOP  
Email Notification, Non Employee Litigation Target gl.legal@target.com  
**REGISTERED AGENT ADDRESS:** C T Corporation System  
28 Liberty Street  
New York, NY 10005  
877-564-7529  
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

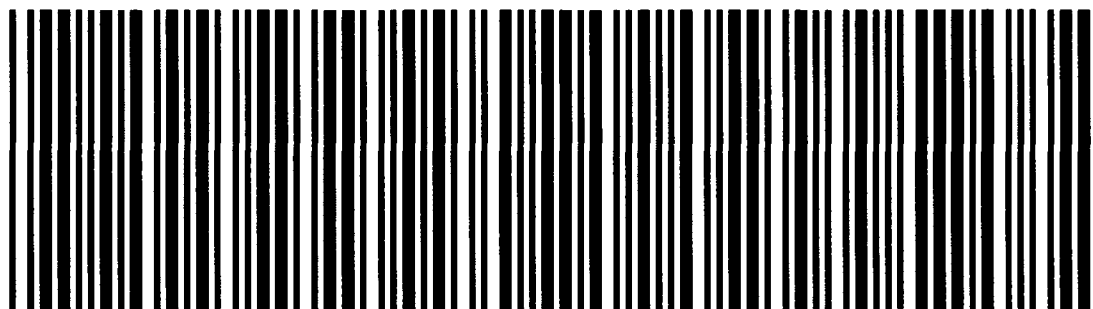


## PROCESS SERVER DELIVERY DETAILS

**Date:** Thu, Jul 1, 2021

**Server Name:** raed ibrahim

Entity Served	TARGET CORPORATION
Case Number	E2021005514
Jurisdiction	NY



SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF MONROE

-----X  
CECELIA LOPEZ

Plaintiff/Petitioner,

- against -  
TARGET CORPORATION

Index No. E2021005514

Defendant/Respondent.  
-----X

**NOTICE OF ELECTRONIC FILING  
(Mandatory Case)  
(Uniform Rule § 202.5-bb).**

**You have received this Notice because:**

- 1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and
- 2) You are a Defendant/Respondent (a party) in this case.

● **If you are represented by an attorney:**

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

● **If you are not represented by an attorney:**

You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.

**If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.**

**The benefits of participating in e-filing include:**

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

**To register for e-filing or for more information about how e-filing works:**

- visit: [www.nycourts.gov/efile-unrepresented](http://www.nycourts.gov/efile-unrepresented) or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at [www.nycourts.gov](http://www.nycourts.gov)

To find legal information to help you represent yourself visit [www.nycourthelp.gov](http://www.nycourthelp.gov)

**Information for Attorneys  
(E-filing is Mandatory for Attorneys)**

An attorney representing a party who is served with this notice must either:

- 1) immediately record his or her representation within the e-filed matter on the NYSCEF site [www.nycourts.gov/efile](http://www.nycourts.gov/efile) ; or
- 2) file the Notice of Opt-Out form with the clerk of the court where this action is pending and serve on all parties. Exemptions from mandatory e-filing are limited to attorneys who certify in good faith that they lack the computer hardware and/or scanner and/or internet connection or that they lack (along with all employees subject to their direction) the knowledge to operate such equipment. [Section 202.5-bb(e)]

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at [www.nycourts.gov/efile](http://www.nycourts.gov/efile) or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: [efile@nycourts.gov](mailto:efile@nycourts.gov)).

Dated: 6/4/18

Edward J. Schwendler, III, Esq.

Name

Schwendler Doolittle law Group, PLLC

Firm Name

1207 Delaware Avenue, Ste.222

Address

Buffalo, NY 14209

(716) 320-1671

Phone

[eschwendler@sdlglaw.com](mailto:eschwendler@sdlglaw.com)

E-Mail

To: Target Corporation

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6/6/18

FILED: MONROE COUNTY CLERK 06/21/2021 01:53 PM

CI 202106210953 E2021005514

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 06/21/2021

STATE OF NEW YORK  
SUPREME COURT : COUNTY OF MONROE

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CECILIA LOPEZ  
84 Leicestershire Road  
Rochester, NY 14614

Plaintiff

vs.

**SUMMONS**

Index #: E2021005514

TARGET CORPORATION  
1000 Nicollet Mall  
Minneapolis, MN 55403

Defendant

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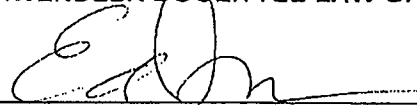
TO THE ABOVE NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with a summons, to serve a notice of appearance, on the plaintiff's attorneys within TWENTY (20) days after the service of this summons, exclusive of the day of service, or within 30 days after completion of service where service is made in any other manner than by personal delivery within the State. In case of your failure to appear or answer, judgment may be taken against you by default for the relief demanded in the complaint.

Monroe County is designated as the place of trial on the basis of the residence of plaintiff who resides at Rochester, New York, State of New York, County of Monroe.

DATED: Buffalo, New York  
June 21, 2021

**SCHWENDLER DOOLITTLE LAW GROUP, PLLC**



Edward J. Schwendler, III, Esq.  
Attorneys for Plaintiff  
1207 Delaware Avenue, Ste.222  
Buffalo, NY 14209  
(716) 320-1671

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C12021005514 E2021005514

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 06/21/2021

STATE OF NEW YORK  
SUPREME COURT : COUNTY OF MONROE

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CECILIA LOPEZ

Plaintiff

vs.

TARGET CORPORATION

Defendant

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**VERIFIED  
COMPLAINT**  
Index #: E2021005514

Plaintiff, by her attorneys, Schwendler Doolittle Law Group, PLLC, for her  
Complaint against the Defendant alleges as follows, upon information and belief:

1. Plaintiff is a resident of the County of Monroe and State of New York.
2. Upon information and belief, Target Corporation, is a foreign corporation organized and existing under the laws of the State of Minnesota, and is authorized to do business in the State of New York.
3. Upon information and belief, on or about April 19, 2019, Defendant, Target Corporation, owned, controlled, operated, managed and maintained certain property at 500 Medley Center Parkway, Irondequoit, New York, including a certain business and premises known as Target Store #2211.
4. This action falls within an exception to CPLR Article 16.

**AS AND FOR A FIRST CAUSE OF ACTION AGAINST  
DEFENDANT, PLAINTIFF ALLEGES AS FOLLOWS:**

5. Plaintiff repeats and realleges Paragraphs "1" through "4" of this Complaint as if fully set forth herein.
6. That on or about April 19, 2019, Plaintiff, Cecilia Mateo Lopez, while

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lawfully walking on the above-mentioned premises, was caused to fall as a result of the negligence and carelessness of Defendants in their ownership, control, operation, management and maintenance of the premises in that it was hazardous for those persons lawfully walking thereon.

7. Upon information and belief, Defendant, its agents, servants and/or employees had actual or constructive notice of the hazardous nature of the aforementioned area of the premises where Plaintiff fell.

8. Upon information and belief, Defendant, its agents, servants and/or employees created the conditions which resulted in the hazardous nature of the aforementioned area of the premises where Plaintiff fell.

9. That by reason of the foregoing and as a result of the carelessness, recklessness and negligence of Defendant, Plaintiff, Cecilia Mateo Lopez, sustained severe, painful and permanent injuries and has and will incur medical expenses and other economic losses, all to her damage in an amount to be determined by the trier of facts that exceed the jurisdictional limit of all lower Courts.


WHEREFORE, Plaintiff demands judgment against Defendant as follows:

On the FIRST CAUSE OF ACTION in an amount to be determined by the trier of facts herein, and

Costs and disbursements of this action.

DATED: Buffalo, New York  
June 21, 2021

SCHWENDLER DOOLITTLE LAW GROUP, PLLC

  
\_\_\_\_\_  
Edward J. Schwendler, III, Esq.  
Attorneys for Plaintiff  
1207 Delaware Avenue, Ste.222

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The undersigned, an attorney admitted to practice in the Courts of New York State, shows that deponent is the attorney of record for Plaintiff, Cecilia Mateo Lopez, in the within action, that deponent has read the foregoing Summons and Complaint and knows the contents thereof; that the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters deponent believes it to be true. Deponent further says that the reason this verification is made by deponent and not by Plaintiff is that Plaintiff resides outside of Erie County, State of New York.

The grounds of deponent's belief as to all matters not stated upon deponent's knowledge are as follows: investigation, medical reports, interviews with client, contents of file, etc.

The undersigned affirms that the foregoing statements are true, under penalty of perjury.

Dated: Buffalo, New York  
June 21, 2021



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Edward J. Schwendler, III, Esq.